HashPort Wallet Privacy Policy

This Privacy Policy (this "Privacy Policy") sets forth how HashPort Inc. (the "Company") handles the personal information (meaning "personal information" as defined in Article 2, Paragraph 1 of the Act on the Protection of Personal Information (the "APPI"); the same applies hereinafter) of users and prospective users (collectively, "Users") of HashPort Wallet and related services provided by the Company (the "Service"). The Company will endeavor to appropriately protect, manage and use Users' personal information in accordance with this Privacy Policy.

Users shall agree to this Privacy Policy before registering for and using the Service.

1. Compliance with Laws, Regulations and Guidelines concerning the Protection of Personal Information, etc.

The Company complies with the APPI and other relevant laws and regulations, guidelines and other norms established by the national government and relevant authorities, and this Privacy Policy.

2. Collection of Personal Information

The Company collects, retains and uses the following personal information concerning Users (collectively, "User Information"), and Users consent thereto.

① The User's name, phonetic reading of name (in katakana), user name, user ID, address, whether the User resides in Japan, date of birth, telephone number, email address and other information entered by the User or provided or submitted to the Company in using the Service (including information as changed at the User's request)

② The User's status in the Service, email verification status and other information on the status or condition of the User's use of the Service

③ The date and time of registration for the Service, dates and times of use of the Service, date and time of email verification and other dates and times related to the use of the Service

④ Model information, identification information and other information concerning the User's device

⑤ The User's IP address information, browsing history and activity history within the Service, history of using, through the Service, the services linked with the Service as provided in Article 7, Paragraph 2 ("Linked Services"), the User's location information, user agent, and advertising ID for mobile devices

⑥ Information concerning the User obtained by the Company from Linked Services, and information concerning the User obtained by the Company through the User's use of Linked Services via the Service

⑦ Other information concerning the User that comes to the Company's knowledge

3. Proper Acquisition of Personal Information

The Company properly acquires User Information in accordance with this Privacy Policy, either by receiving it from Users or by obtaining it from the partners of the Service that provide Linked

Services (“Linked Service Providers”), and does not acquire personal information through deception or other wrongful means.

4. Purposes of Use of Personal Information

In addition to cases permitted by laws and regulations, the Company uses User Information for the following purposes, and Users consent thereto. Except as permitted by laws and regulations, the Company will not handle User Information beyond the scope necessary to achieve the purposes of use without the prior consent of the individual.

① To properly and smoothly provide and operate the Service

② To send notices and communications concerning the Service

③ For administrative procedures such as applications for use of, deregistration from and changes to registration information for the Service, and other confirmation procedures in operating the Service

④ To detect and record fraudulent transactions using the Service and fraudulent use of the Service, and to take countermeasures

⑤ To provide information about the various services, etc. offered by the Company

⑥ To improve, enhance and add functions to the various services provided by the Company, to develop new products and services of the Company, and for related statistical analysis and analysis of customer trends

⑦ To link with other services and apps, and to introduce Linked Services

⑧ For Users’ use of Linked Services

⑨ For use by Linked Service Providers in providing Linked Services to Users in connection with ⑧ above

⑩ To respond to inquiries, consultations and complaints from Users, and to resolve disputes

⑪ To provide information to third parties by the methods set forth in this Privacy Policy

⑫ To analyze Users’ attributes, preferences, etc. and, based on such attributes, preferences, etc., to deliver advertisements and information concerning various services, etc. provided by the Company, Linked Service Providers or third parties that are their advertisers

⑬ To measure the effectiveness of, and conduct market analysis concerning, the Service and related advertising and marketing, and to use the results to improve and market the various services provided by the Company

⑭ To survey and analyze the usage of the Service and Linked Services, prepare statistical information using the results, and provide such statistical information to the Company or Linked Service Providers, so as to enable its use for improving, enhancing and adding functions to various services and developing new products and services of the Company or Linked Service Providers

⑮ In addition to the above, to exercise rights and perform obligations under contracts with Users or under laws and regulations, etc.

5. Delivery of Advertising and Other Emails

The Company, or a Linked Service Provider to which a User has requested the Company to provide User Information under Article 7, Paragraph 2, may deliver newsletters, advertisements, etc. concerning its services to Users by email.

6. Security Control Measures for Personal Information

The Company will endeavor to keep User Information accurate and up to date and, to prevent leakage, loss or damage of personal data and otherwise ensure the security of personal data, will implement the following security control measures for the handling of User Information and take corrective measures, etc. as necessary.

① The Company establishes rules for the handling of personal information and checks their implementation, develops an organizational structure for implementing security control measures, such as by appointing persons responsible for handling, and endeavors to keep track of the handling of User Information and to review its security control measures.

② The Company ensures that employees are fully informed of the proper handling of User Information, provides appropriate training, and exercises necessary and appropriate supervision.

③ The Company takes measures such as controlling entry to and exit from its facilities and preventing theft of electronic media, etc.

④ The Company implements access control for information systems handling User Information, measures to prevent unauthorized access, etc., and other security measures.

⑤ When handling User Information in a foreign country, the Company understands the personal information protection system, etc. of such foreign country and implements necessary and appropriate measures for the security control of personal data.

7. Restrictions on Provision of Personal Information to Third Parties

(1) The Company will not disclose or provide User Information to third parties without the prior consent of the individual, except in the following cases:

① Where based on laws and regulations

② Where necessary to protect the life, body or property of a person and it is difficult to obtain the individual's consent

③ Where especially necessary to improve public health or promote the sound development of children and it is difficult to obtain the individual's consent

④ Where necessary to cooperate with a national government agency, a local government or a person entrusted by either of them in performing affairs prescribed by laws and regulations, and obtaining the individual's consent is likely to impede the performance of such affairs

⑤ Where the third party receiving the disclosure or provision is an academic research institution, etc. and needs to handle the personal data for academic research purposes (including where part of

the purpose of handling the personal data is academic research, but excluding where there is a risk of unjustly infringing the rights and interests of individuals)

⑥ Where provided to an external service operator in order to link with another service not operated by the Company, or for authentication using an external service

⑦ Where the Company outsources part of its operations within the scope necessary to achieve the purposes of use

⑧ Where personal information is provided in connection with the succession of business due to a merger or other reasons

⑨ Other cases permitted by laws and regulations

(2) When a User uses a Linked Service, the User, after reviewing the information displayed at the start of use of the relevant Linked Service, requests the Company to provide User Information on the User's behalf to the Linked Service Provider that provides such Linked Service, and consents to the Company providing User Information to such Linked Service Provider based on such request.

8. Outsourcing of the Handling of User Information

The Company may outsource all or part of the handling of User Information to third parties to the extent necessary to achieve the purposes of use. In such cases, the Company will select persons deemed to handle User Information properly, appropriately stipulate in the outsourcing agreement matters concerning security control, confidentiality, conditions for re-outsourcing and other matters relating to the handling of User Information, and exercise necessary and appropriate supervision.

9. Requests for Disclosure, etc.

When the Company receives a request from a User for notification of the purposes of use of, disclosure of, correction, addition or deletion of, cessation of use or erasure of, or cessation of provision to third parties of, the retained personal data concerning such User, or for disclosure of records of provision to third parties (collectively, "Disclosure, etc."), the Company will respond in accordance with laws and regulations after confirming the requester's identity. If an agent makes a request for Disclosure, etc. on behalf of the individual, the agent is requested to submit documents evidencing its authority to act as agent. For the procedures for requests for Disclosure, etc., please refer to this link.

10. Handling of Personally Referable Information

(1) When the Company obtains personally referable information as defined in the APPI from a third party in connection with the Service and uses it as personal data, the Company will take measures in advance, such as obtaining the individual's consent to the Company obtaining such personally referable information as personal data, and will use it within the scope of the purposes of use set forth in Article 4.

Currently, the cases in which personally referable information received from third parties may be

collated with, linked to, added to or otherwise combined with personal data held by the Company and used to achieve the purposes of use set forth in Article 4 are as follows:

Provider of personally referable information: KANA LABS (UK) LTD

Type of information received by the Company: wallet addresses and transaction histories of users of the DeFi aggregator service of KANA LABS (UK) LTD

(2) When providing personally referable information to a third party, if the third party is expected to use the personally referable information as personal data, the Company will confirm, among other things, that the third party has obtained in advance the individual's consent to the third party obtaining such personally referable information as personal data.

11. Use of Cookies and Other Technologies

The Service may use cookies and similar technologies. These technologies help the Company understand the usage, etc. of its services and contribute to improving them. Users may delete stored cookies, but in that case some functions of the Service may become unavailable.

12. Company Information

HashPort Inc.

Daiwa Azabu Terrace 5F, 3-20-1 Minami-Azabu, Minato-ku, Tokyo, Japan

Representative Director & CEO: Seihaku Yoshida

13. Personal Information Protection Manager

Title of manager: General Manager, General Affairs Department

Department: General Affairs Department, HashPort Inc.

Contact: privacy@hashport.io

14. Contact Point for Inquiries

The Company will respond promptly and appropriately to complaints and consultations from Users regarding the handling of personal information. Please also contact the Company at the contact point below for inquiries and consultations regarding the Company's handling of personal information and for requests for Disclosure, etc.

* Please note that the Company cannot accept inquiries or requests made in person at its office.

[Contact Point]

Personal Information Desk, HashPort Inc.

Daiwa Azabu Terrace 5F, 3-20-1 Minami-Azabu, Minato-ku, Tokyo, Japan

Email: privacy@hashport.io

Hours: Weekdays 10:00–17:00 JST (inquiries received during the year-end and New Year holidays, Golden Week and the Company's summer holiday period will be handled on or after the next business day)

15. If a User Does Not Agree to this Privacy Policy, etc.

If a User does not enter the information necessary to use the Service, does not provide, transmit or submit to the Company the matters prescribed by the Company, including User Information, or does not agree to all or part of this Privacy Policy, the Company may refuse to permit the User to use the Service.

16. Amendment

The Company may amend all or part of this Privacy Policy, and Users agree to this in advance. When amending this Privacy Policy, the Company will notify Users or publicly announce the amendment by the method prescribed by the Company.

Special Provisions concerning the EU General Data Protection Regulation

With respect to the processing of User Information by the Company that is subject to applicable privacy laws and regulations, including the EU General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) (the "GDPR") and related national implementing laws, the following special provisions (these "Special Provisions" and, together with this Privacy Policy, this "Privacy Policy, etc.") apply in addition to this Privacy Policy. Terms defined in the GDPR have the meanings given to them therein.

1. Types of Information Collected

The types of personal data collected by the Company are as set forth in Article 2 of this Privacy Policy.

2. Purposes of Use and Legal Bases

The Company uses personal data for the following purposes. The legal basis for each purpose of use is as stated in each item.

(1) To properly and smoothly provide and operate the Service

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(2) To send notices and communications concerning the Service

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(3) For administrative procedures such as applications for use of, deregistration from and changes to registration information for the Service, and other confirmation procedures in operating the Service

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(4) To detect and record fraudulent transactions using the Service and fraudulent use of the Service, and to take countermeasures

Legal basis: Necessary for compliance with a legal obligation to which the Company is subject; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(5) To provide information about the various services, etc. offered by the Company

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; necessary for the Company's legitimate interest in providing its services appropriately or efficiently; and the User's consent to such purpose of use.

(6) To improve, enhance and add functions to the various services provided by the Company, to develop new products and services of the Company, and for related statistical analysis and analysis of customer trends

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; necessary for the Company's legitimate interest in providing its services appropriately or efficiently; and the User's consent to such purpose of use.

(7) To link with other services and apps

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; necessary for the Company's legitimate interest in providing its services appropriately or efficiently; and the User's consent to such purpose of use.

(8) For Users' use of Linked Services

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(9) For use by Linked Service Providers in providing Linked Services to Users in connection with (8) above

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(10) To respond to inquiries, consultations and complaints from Users, and to resolve disputes

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for compliance with a legal obligation to which the Company is subject; necessary for the Company's legitimate interest in responding to inquiries, complaints, etc. from Users; and the User's consent to such purpose of use.

(11) To provide information to third parties by the methods set forth in this Privacy Policy

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(12) To analyze Users' attributes, preferences, etc. and, based on such attributes, preferences, etc., to deliver advertisements and information concerning various services, etc. provided by the Company, Linked Service Providers or third parties that are their advertisers

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(13) To measure the effectiveness of, and conduct market analysis concerning, the Service and related advertising and marketing, and to use the results to improve and market the various services provided by the Company

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(14) To survey and analyze the usage of the Service and Linked Services, prepare statistical information using the results, and provide such statistical information to the Company or Linked Service Providers, so as to enable its use for improving, enhancing and adding functions to various services and developing new products and services of the Company or Linked Service Providers

Legal basis: Necessary for the Company's legitimate interest in promoting and developing its business; and the User's consent to such purpose of use.

(15) To provide the Point Exchange Service and the Gift Code Purchase Service, and for reconciliation and other administrative matters with Point Providers, Gift Code Issuers and other relevant businesses in connection therewith

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(16) To comply with laws and regulations, etc. and to prevent violations of laws and regulations, etc. concerning money laundering, terrorist financing and economic sanctions (including checking whether a User is subject to economic sanctions)

Legal basis: Necessary for compliance with a legal obligation to which the Company is subject; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(17) For accounting, tax and other proper management of the Company's operations

Legal basis: Necessary for compliance with a legal obligation to which the Company is subject; and necessary for the Company's legitimate interest in properly managing its business.

(18) To provide the MCP Service (including transmitting information to AI services based on the User's instructions), and to manage consents, approvals and pre-approvals in the MCP Service

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for the Company's legitimate interest in providing the Service appropriately or efficiently; and the User's consent to such purpose of use.

(19) In addition to the above, to exercise rights and perform obligations under contracts with Users or under laws and regulations, etc.

Legal basis: Necessary for the performance of a contract between the Company and the User or to take steps at the User's request prior to entering into a contract; necessary for compliance with a legal obligation to which the Company is subject; and the User's consent to such purpose of use.

3. Sharing of Personal Data

(1) Point Providers and Gift Code Issuers

When a User uses the Point Exchange Service or the Gift Code Purchase Service, the Company provides the User's personal data to Point Providers or Gift Code Issuers as set forth in Article 7, Paragraphs 3 and 4 of this Privacy Policy.

(2) Linked Service Providers

Subject to the User's prior consent, the Company provides the User's personal data to the Linked Service Providers that provide the Linked Services used by the User.

For the types of personal data provided to Linked Service Providers and the purposes of use by Linked Service Providers, please check the information displayed at the start of use of the relevant Linked Service.

(3) Suppliers, etc.

The Company may share Users' personal information with its outsourcing contractors and with suppliers that provide various services to the Company, such as hosting, maintenance services, support services, email services, monitoring, marketing, handling of Users' use of the Service, provision of customer service, and conducting customer surveys and satisfaction surveys.

(4) Corporate Restructuring, etc.

In the event of a merger, company split, share exchange, share transfer, share delivery, business transfer, transfer of assets, or corporate reorganization or civil rehabilitation (including in connection with bankruptcy or similar proceedings) relating to all or part of the Company's business, the Company may provide Users' personal data to relevant third parties.

(5) Legal Compliance, etc.

The Company may be required to disclose Users' personal data under laws, cabinet orders and ministerial ordinances, rules (including the rules of financial instruments exchanges or securities associations), local ordinances, treaties, guidelines, notices, circulars, public notices, administrative guidelines, self-regulation by self-regulatory organizations and other similar rules (including their equivalents in foreign jurisdictions), or at the request of public institutions and government authorities in or outside the User's country of residence.

In addition, the Company may disclose Users' personal data where it determines that disclosure is reasonably necessary to protect its rights, seek available remedies, enforce its rights, investigate fraud, or protect its business or customers.

(6) Providers of AI Services

When a User uses the MCP Service, the Company transmits the User's personal data, based on the User's instructions, to the provider of the AI service connected by the User, as set forth in Article 7, Paragraph 5 of this Privacy Policy.

4. Handling of Personal Data within Japan

The Company handles Users' personal data within Japan. However, when a User uses an External Linked Service or the MCP Service, personal data may be provided, based on the User's consent, to businesses outside Japan that provide such External Linked Service or AI service.

Japan has received a decision from the European Commission recognizing that it provides a level of data protection equivalent to the GDPR (an adequacy decision).

5. Retention Period of Personal Data

The Company retains Users' personal data only for the period necessary for the purposes of collection and processing. The specific retention period is determined taking into account the purposes of collection and processing of the personal data, the nature of the personal data, and any legal or business need to retain the personal data.

However, the Company may retain and process Users' personal data for longer than is necessary for the purposes of collection and processing in certain circumstances, such as for the purpose of exercising its rights or performing its obligations, for the performance of a task carried out in the public interest, or with the User's consent.

6. Rights of Data Subjects

As a data subject, each User has the following rights.

• Right of access

Users may request disclosure of their personal data held by the Company. In addition, upon the User's request, the Company will provide additional information regarding the processing of the User's personal data.

• Right to rectification

Users may request the correction of incomplete or inaccurate data concerning them held by the Company. In such case, the Company may require procedures to verify the accuracy of the data newly provided by the User to the Company.

• Right to erasure

Users may request the Company to erase their personal data where, for example, the Company has no legitimate grounds for continuing to process the personal data, the personal data is no longer needed, or the User has withdrawn consent that was the sole legal basis for processing.

• Right to restriction of processing

Users may request the Company to stop processing their personal data where the User wishes to ensure the accuracy of the personal data, the Company's processing of the personal data is unlawful, the Company no longer needs to process the personal data, or an objection procedure is pending.

• Right to data portability

Users may request that their personal data be provided to themselves or to a third party of their choice in a structured, commonly used and machine-readable format. However, this right applies only to processing carried out by the Company by automated means, and only where the legal basis for such processing is the User's consent or the performance of a contract to which the User is a party.

• Right to object

Where the Company processes personal data on the legal basis of its legitimate interests and such processing appears to affect the User's fundamental rights, the User may object to the Company's processing of the User's personal data. Users also have the right to object where the Company processes their personal data for direct marketing purposes.

• Right to withdraw consent

Where the Company processes personal data based on the User's consent, the User may withdraw consent at any time. However, withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

• Right to lodge a complaint

Users may lodge a complaint with a competent data protection supervisory authority. The Company would appreciate the opportunity to address the User's concerns before the User contacts the supervisory authority, and therefore asks Users to contact the Company first.

• Automated decision-making

Users have the right not to be subject to a decision based solely on automated processing that produces legal effects concerning them or similarly significantly affects them. However, the Company does not make decisions based solely on automated processing.

7. No Legal Obligation

Users are under no legal or contractual obligation to provide personal data to the Company until they have completed the procedures prescribed by the Company that are necessary for using the Service, such as accepting the Company's Terms of Use and this Privacy Policy, etc. If, after completing such procedures, a User refuses the Company's use of personal data, the User's use of all or part of the Service may be restricted.

8. Use by Minors

The Company does not knowingly collect or process information concerning persons under the age of 16 without the permission and consent of the holder of parental responsibility. If the Company discovers that it has directly collected or processed personal information of a person under the age of 16 (or under such other minimum age, to the same effect as that under the GDPR, as may be provided by the law of an EU Member State) without the permission and consent of the holder of parental responsibility, it will take measures to delete such information as soon as possible.

9. Amendment

Amendments to these Special Provisions are governed by Article 16 of this Privacy Policy.

10. Controller and Contact

The controller and contact point for the processing of Users' personal data are as follows.

Personal Information Desk, HashPort Inc.

Daiwa Azabu Terrace 5F, 3-20-1 Minami-Azabu, Minato-ku, Tokyo, Japan

Email: privacy@hashport.io